

LAW OFFICES OF  
**SIMON HARTER**

225 W. 34<sup>th</sup> Street – 9<sup>th</sup> Floor  
New York, New York 10122  
Tel: (212) 979-0250  
Fax: (212) 979-0251  
[sharter@harterlaw.com](mailto:sharter@harterlaw.com)

30 Nassau Street – Suite 460  
Princeton, New Jersey 08542  
Tel: (609) 688-8330  
Fax: (609) 688-8331  
[www.harterlaw.com](http://www.harterlaw.com)

July 30, 2020

Via ECF

Hon. J. Paul Oetken, USDJ  
US District Court for the Southern District of New York  
Room 2101  
40 Foley Square  
New York, NY 10007

Re: In re Application of Tatiana Akhmedova  
Request for Discovery Pursuant to 28 U.S.C. § 1782  
Civil Action No. 19-mc-26 (JPO)

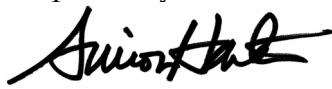
Dear Judge Oetken:

We represent non-party Y.CO NY Inc. in connection with Applicant's motion to compel our client's response to her subpoena. We write to respectfully request the opportunity to submit a very brief letter response, of no more than three typed pages, to the *Reply Memorandum in Further Support of Applicant's Motion to Compel* [Docket NO. 35) filed by Applicant this evening.

It is not our practice to seek such relief, and we are mindful of the importance of not unduly taxing the Court's judicial resources. In this particular instance, we respectfully submit that a brief addition submission is warranted. In her Reply, Applicant has once again engaged in a striking degree of misrepresentation and omission of fact. Chief among these are the fact that in responding to Y.CO NY's request for a protective order, Applicant has omitted certain facts surrounding the Confidentiality Stipulation entered in the corresponding state court action to such a degree as to paint an entirely misleading and false picture for the Court.

We thank the Court for its kind attention to this request.

Respectfully submitted,



Simon Harter

July 30, 2020

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cc: Via ECF

James H. Power, Esq.  
[james.power@hklaw.com](mailto:james.power@hklaw.com)  
Holland & Knight LLP  
31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Attorneys for Applicant